1	BRIAN D. NETTER Deputy Assistant Attorney General	
2	STEPHANIE HINDS	
3	Acting United States Attorney MARCIA BERMAN	
4	Assistant Branch Director	
	R. CHARLIE MERRITT Trial Attorney	
5	U.S. Department of Justice Civil Division, Federal Programs Branch	
6	1100 L Street NW	
7	Washington, DC 20005 (202) 616-8098	
8	È-mail: robert.c.merritt@usdoj.gov	
9	Attorneys for Defendants	
10	UNITED STATES I	DISTRICT COURT
11	FOR THE NORTHERN DIS	
12		
13	THE PEOPLE OF THE STATE OF	No. 3:17-cv-7106-SK
14	CALIFORNIA,	
15	Plaintiff,	
16	v.	
17	UNITED STATES DEPARTMENT OF EDUCATION, et al.,	
18	Defendants.	
19		
20	MARTIN CALVILLO MANRIQUEZ, et al.,	No. 3:17-cv-7210-SK
21	Plaintiffs,	
22	V.	JOINT STATUS REPORT
23		
24	UNITED STATES DEPARTMENT OF EDUCATION, et al.,	
25	Defendants.	
26		
27		
28		

Joint Status Report 3:17-cv-7106-SK; 3:17-cv-7210-SK

The parties hereby submit the following status report in response to the Court's October 19, 2021 order.

The parties continue to work in good faith to finalize the language of a draft settlement agreement reflecting their agreement in principle to resolve the case without further litigation. As previously reported, the issues that remain to be resolved prior to any final settlement involve dataintensive analysis, and the parties continue to work diligently to conduct that analysis. The parties believe that additional time would be beneficial to allow the parties to continue their negotiations while that analysis occurs. Accordingly, and in light of the upcoming holidays and associated absences from the office, the parties respectfully request that the Court set a further deadline for a status report in 60 days.

Dated: December 20, 2021

Respectfully submitted,

BRIAN D. NETTER Deputy Assistant Attorney General

MARCIA BERMAN Assistant Branch Director

/s/ R. Charlie Merritt

R. CHARLIE MERRITT (VA Bar # 89400) Trial Attorney U.S. Department of Justice

Civil Division, Federal Programs Branch 1100 L Street NW

Washington, DC 20005 (202) 616-8098

È-mail: robert.c.merritt@usdoj.gov

Attorneys for Defendants

26

/s/ Bernard A. Eskandari

**ROB BONTA** 

Attorney General of California

NICKLAS A. AKERS

Senior Assistant Attorney General

BERNARD A. ESKANĎARI (SBN 244395)

27 Supervising Deputy Attorney General AMOS E. HARTSTON (SBN 186471)

28 Deputy Attorney General

300 South Spring Street, Suite 1702

Joint Status Report

3:17-cv-7106-SK; 3:17-cv-7210-SK

1	Los Angeles, CA 90013 Tel: (213) 269-6348
2	Fax: (213) 897-4951 Email: bernard.eskandari@doj.ca.gov
3	Attorneys for Plaintiff the People of the State
4	of California
5	/s/ Joseph Jaramillo
6	JOSEPH JARAMILLO (SBN 178566) Housing & Economic Rights Advocates
7	3950 Broadway, Suite 200 Oakland, CA 94611
8	Tel.: (510) 271-8443 Fax: (510) 868-4521
9	Email: ctorchiana@heraca.org
10	/s/ Margaret O'Grady   EILEEN M. CONNOR (SBN 248856)   MARGARET F. O'GRADY (Pro Hoo Vice)
11	MARGARET E. O'GRADY (Pro Hac Vice) Legal Services Center Of Harvard Law School 122 Boylston Street
12	Jamaica Plain, MA 02130
13	Tel.: (617) 390-3003 Fax: (617) 522-0715 Email: mogrady@law.harvard.edu
14	Attorneys for Class Plaintiffs
15	Attorneys for Class I turniffs
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

Joint Status Report 3:17-cv-7106-SK; 3:17-cv-7210-SK